

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

December 20, 2023

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees, along with counsel for the *Ashton* Plaintiffs, write regarding the Plaintiffs' sealed filings being made today responding to Saudi Arabia's October 6, 2023 "Renewed Motion to Dismiss" [ECF No. 9368] and Dallah Avco's October 6, 2023 "Renewed Motion to Dismiss or in the Alternative for Summary Judgment" [ECF No. 9362].

Plaintiffs are filing the following documents on the Court's Electronic Filing System, under seal, with the Court's previous authorization: Plaintiffs' briefs and accompanying submissions, including the attorney declarations of Robert T. Haeefe and J. Gavin Simpson identifying the exhibits, and Exhibit 1 to the Haeefe Declaration, which is "Plaintiffs' Averment Of Facts And Evidence In Support Of Their Claims Against The Kingdom Of Saudi Arabia And Dallah Avco In Response To ECF Nos. 9362 And 9368." Pursuant to the Court's authorization in the endorsement at ECF No. 9479, copies of the exhibits after Exhibit 1 are being filed by hand-delivery to the Court of USB-enabled drives. Plaintiffs will coordinate with the clerk's office regarding subsequent filing on the ECF system in a manner that causes the least possible disruption to court operations.

Plaintiffs are serving counsel for Saudi Arabia and Dallah Avco electronically copies of each of the indicated documents, including the exhibits on the drives delivered to the Court.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

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On behalf of the Ashton Plaintiffs

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF